

BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

IN RE COMPLIANCE)	PDC CASE NO:	01-203
WITH RCW 42.17)		01-204
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)		
KING COUNTY, KING COUNTY)	REPORT OF INVESTIGATION	
DEPARTMENT OF TRANSPORTATION,)		
& KING COUNTY TRANSIT)		
)		
AMALGAMATED TRANSIT)		
UNION LOCAL 587)		
<u>Respondents</u>)		

I.

BACKGROUND

- 1.1 On March 28, 2001, Monte Benham of Permanent Offense filed a complaint with the Office of the Attorney General under RCW 42.17.400 - requiring disposition within 45 days. Mr. Benham alleged that King County, King County Department of Transportation, and King County Transit (King County) and the Amalgamated Transit Union Local 587 (ATU Local 587) had violated RCW 42.17 during the 2000 election cycle by imposing a special dues assessment of its members to oppose Initiative 745. The complaint further alleged that the special assessment was withheld from the paychecks of employees of King County to fight Initiative 745, without first obtaining the required written authorization from each employee. King County and the ATU Local 587 are alleged to have withheld transit union member's dues without specific authorization. On March 29, 2001 a similar complaint (PDC case # 01-204), alleging similar violations by King County and ATU Local 587 was filed by David Cornelson. The investigation of the second complaint by Mr. Cornelson is incorporated into this report.

II.

SCOPE

2.1 The following documents were reviewed:

- a. Complaint letter
- b. Responses from King County
- c. Responses from ATU Local 587

2.2 The following persons were interviewed:

- a. Monte Benham, complainant.
- b. Mary Peterson, Assistant Director of King County Transit.
- c. Mildred Llarenas, King County Payroll Supervisor.
- d. Lance Norton, President of Amalgamated Transit Union Local 587.
- e. Paul Toliver, Director of the King County Department of Transportation.

III.

APPLICABLE LAW AND
ADMINISTRATIVE RULES

3.1 **RCW 42.17.680** Limitations on employers or labor organizations.

“(3) No employer or other person or entity responsible for the disbursement of funds in payment of wages or salaries may withhold or divert a portion of an employee's wages or salaries for contributions to political committees or for use as political contributions except upon the written request of the employee. The request must be made on a form prescribed by the commission informing the employee of the prohibition against employer and labor organization discrimination described in subsection (2) of this section.

The request is valid for no more than twelve months from the date it is made by the employee.”

3.2 WAC 390-17-100 Contribution withholding authorizations.

“(1) For purposes of (3), all political contribution withholding authorizations existing on or before January 1, 1993, will expire no later than December 31, 1993. Beginning January 1, 1994, each employer or other person who withholds or otherwise diverts a portion of wages or salary of a Washington resident or a nonresident whose primary place of work is in the state of Washington.

(a) For the purpose of making one or more contributions to any political committee required to report pursuant to RCW 42.17.040, [42.17].050, [42.17].060 or [42.17].090 (1)(k), or

(b) For use, specifically designated by the contributing employee, for political contributions to candidates for state or local office is required to have on file the written authorization of the individual subject to the payroll withholding or diversion of wages.

(2) Employers may either use the suggested format below or their own form if it provides the following information:

(a) The name of the individual authorizing the withholding or diversion;

(b) The name of the individual's employer;

(c) The name, city and state of each political committee for which contributions are to be withheld;

(d) If more than one political committee is specified, the total dollar amount per pay period (or per week, month or year) to be withheld for each committee;

(e) The date on which the authorized withholdings or diversions are to be effective;

(f) A statement specifying that the authorization is not valid for more than 12 months after the effective date;

(g) A statement that reads: "No employer or labor organization may discriminate against an officer or employee in the terms or conditions of employment for (i) the failure to contribute to, (ii) the failure in any way to support or oppose, or (iii) in any way supporting or opposing a candidate, ballot proposition, political party, or political committee;"

(h) The individual's signature; and

(i) The date on which the form was completed.

(3) Forms used for payroll deduction may have information in addition to that listed above. The forms may accommodate annual re-authorization by providing space for the employee's signature and the date of re-authorization is signed, up to three re-authorizations."

IV.

FINDINGS

4.1 The complaint from Monte Benham alleged that: **(Exhibit 1)**

- King County violated RCW 42.17.680 "by withholding dues from their employee's wages that were used by the ATU Local 587 for contributions to political campaigns, (Amalgamated Transit Union Legislative Council Committee on No I-745- ATULCC NO I-745)." He maintained, "where the employer has notice that the deducted funds are for the use of a political committee or candidate, the employer must have the employee's written annual consent."
- Mr. Benham filed his complaint with the Office of the Attorney General and the Office of the King County Prosecutor. The investigation was assigned to the Public Disclosure Commission.
- Mr. Benham included a number of documents along with his complaint to verify that ATU Local 587 used an unauthorized special dues assessment of its members to make contributions to the ATULCC NO I-745 Political Action Committee. He said that King County took no steps to obtain written authorization as required. Some of the documentation submitted with the complaint included the following:
 1. A letter from the ATU Legislative Council to the Union membership, sent by facsimile on July 13, 2000. The letter explained the Union's position on I-745, and asked for approval of a \$50 assessment per member to finance the campaign against I-745. Mentioned are "radio, TV and many other costs associated with an effective campaign".
 2. An August 7, 2000, notice to ATU Local 587 members about an upcoming informational forum regarding I-745. The notice stated the following about the forum **"Local 587 will hold an informational forum to discuss the impacts of Initiative 745 and the special**

assessment vote proposed by the Executive Board to fight this threat to public transit statewide. ATU Legislative Council President Mike Powell will be on hand to discuss plans to fight the initiative."

3. An August 14, 2000 letter from Union attorney Clifford Freed to Paul Toliver, King County Transportation Director. Mr. Freed said that the dues assessment "would be used to oppose Initiative 745". He argued, "Local 587's distribution of literature to defeat Initiative 745 has a direct and substantial nexus to the working conditions of its members." Mr. Freed stated that the Union has the right to conduct a special assessment election.
4. An August 16, 2000 ATU Local 587 flyer labeled "please post." The flyer notifies union members of King County's decision to not allow a vote at the worksites. The flyer sets the vote date for August 24th, 2000 at the worksites.
5. An August 24, 2000 ATU Local 587 notice to members labeled "please post" showing that the assessment referendum vote passed.
6. An undated flyer, author unknown, stamped "please post." The flyer indicated that \$663,000 was spent for signature gatherers by the pro I-745 campaign. The flyer encouraged a yes vote for the "assessment to defeat I-745." The flyer stated: **"This money will help to buy TV and radio advertising, hire grassroots field staff throughout the state, and produce the signs and leaflets we need to defeat this initiative."** Included was an article from the September 2000 ATU Local 587 Newsletter entitled Shame on Us. The flyer indicated that one-half of the Union membership voted in the special assessment election.
7. Reports filed with the PDC were included as part of Mr. Benham's complaint. Those reports indicated that ATU Legislative Council Committee No I-745 filed a Committee Registration Statement (PDC Form C-1pc) on August 1, 2000. The reports filed by the Amalgamated Transit Union Legislative Council Committee on No I-745 indicated they raised a total of \$181,273 in contributions received and spent a total of \$156,464 in committee expenditures in opposition to Initiative 745. The majority of contributions received by the committee were from Amalgamated Transit Unions from around the state of Washington.

8. Assorted King County employee pay stubs showing the special assessment deduction deducted from paychecks between the period of September 15, 2000 to November 10, 2000.

4.2 The response from King County was written by Peter Ruffatto, Deputy Prosecuting Attorney for King County. **(Exhibit 3)** Mr. Ruffatto stated that:

- a. In August 2000, King County was aware that ATU Local 587 intended to hold an election regarding a dues assessment of its membership. ATU Local 587 indicated that this assessment was for the purpose of opposing Initiative 745. This assessment was similar to past special dues assessments by the Local for furtherance of its members' interests. **(See exhibit 5, letter dated August 14, 2000).**
- b. After the election, ATU Local 587 notified the King County payroll section that the membership had elected to assess each member \$50 in special dues to oppose I-745. He appended a letter from the Union **(See Exhibit 5, letter dated August 25, 2000).**
- c. At the direction of the Union, using existing signed Authorizations for Wage Deduction to Cover Union Dues, King County payroll made the special deduction. Mr. Ruffatto appended 3 wage deduction authorizations: **(See Exhibit 3, pages 9 and 15)**
 1. Authorization for Wage Deduction to Cover Union Dues for "initiation fees, monthly dues and assessments levied."
 2. ATU-COPE Check off Authorization Card addressed "To my Employer." This authorization authorizes and directs King County to deduct monies and remit them to the ATU Committee on Political Education. It includes a statement that "ATU-COPE is a political action committee (PAC) connected with the Amalgamated Transit Union, which will use my contribution for political purposes including.....addressing federal, state and local political issues."
 3. ATU Local 587 Waiver of I-745 Assessment. Several copies of this signed waiver were included.

Mr. Ruffatto did not specify which version of the authorization was received by King County.

King County, King County Department of Transportation, King County Transit, and
Amalgamated Transit Union Local 587
Report of Investigation
PDC Case No. 01-203 & 01-204

- d. A letter dated September 14, 2000 was enclosed from Paul Griffin, ATU Local 587 Financial Secretary. It included names of ATU members who had signed a waiver requesting to not have the special assessment deducted. The waivers were sent to Janet Brown (King County payroll specialist who handled Union payroll deductions). **(See Exhibit 3, page 15)**
 - e. Mr. Ruffatto said that King County had no knowledge of the intended use of the special dues assessment deducted from transit employees of ATU Local 587. He said King County was bound by Union agreement to withhold based upon employee authorizations. He cited language in the agreement that said, "Authorization by the employee shall be on a form approved by the parties hereto and may be revoked by the Employee upon request."
 - f. He requested dismissal of the complaint because King County understood that ATU Local 587 is not a registered political committee. Mr. Ruffatto said, "Neither King County Metro nor King County Payroll were on notice when the dues deductions were made that a special authorization was necessary because they were not made aware that any of the funds would be forwarded to a political committee. The Payroll section, based on information provided by ATU Local 587, made the special dues deduction consistent with other deductions made under the Labor Agreement."
- 4.3 The response from the Amalgamated Transit Union, Local 587, was written by Clifford Freed, attorney for the Union. **(Exhibit 4)** His response said that:
- a. The Union denies any violation of RCW 42.17.680(3). Mr. Freed said the statute does not apply to labor organizations as evidenced by the Washington State Supreme Court decision in the case of Washington Education Association vs. Evergreen Freedom Foundation.
 - b. In response to a PDC query, the following information was forwarded by ATU Local 587:
 - 1. There were five documents that included correspondence between the Union and King County concerning the special dues assessment. **(Exhibit 5)**

King County, King County Department of Transportation, King County Transit, and
Amalgamated Transit Union Local 587
Report of Investigation
PDC Case No. 01-203 & 01-204

- a. An August 14, 2000 letter from Clifford Freed (Union attorney) to Paul Toliver, Director of Transportation. This letter asserts the Union's right to conduct a special election for an assessment "to oppose I-743."
 - b. An August 16, 2000 letter from the Union leadership to Paul Toliver advising of an upcoming election on the assessment. This letter contained no reference to the reason for the assessment.
 - c. An August 25, 2000 letter from Paul Griffin, Financial Secretary for ATU Local 587, to Mildred Llarenas, King County Payroll Supervisor, asking that the assessment monies be deducted from members' wages. The issue is called "the I-745 assessment."
 - d. Three e-mails between Ms. Llarenas and Paul Griffin dated September 25 and September 27, 2000. They confirm the process for making wage deductions. The reason for the deductions is termed "I-745 deduction" and "No to I-745 Assessment."
 - e. An October 24, 2000 letter from Paul Griffin to Ms. Llarenas forwarding copies of the official Waiver for Assessment forms. The assessment is termed "I-745 Assessment."
2. Citing a letter dated August 25th, 2000, from Paul Griffin to Mildred Llarenas, Mr. Freed said: **"Metro was aware that the dues assessment was to oppose Initiative 745." He said Metro was not aware how the assessments would be used to fight I-745. "At that point, the Union itself had not determined the manner in which the money would be spent."**
 3. In the August 2000 ATU Newsletter Union members were told that the assessment would be used to fight I-745. No reference is made as to the way the fight would be made. **(See Exhibit 6)**
 4. There were a total of 302 requests received by the Union from transit employees indicating that the assessments not be withheld from their paychecks. These requests were forwarded to King County payroll. These waivers were made available at

sites used for voting on the special assessment. **(See Exhibit 7, page 1)**

5. After being remitted to the Union, the assessment monies were deposited in the Union's general fund account, not remitted directly to a political committee.

4.4 Mary Peterson was interviewed under oath on April 25, 2001. **(Exhibit 8)** In the interview, Ms. Peterson stated the following:

1. She is the Assistant General Manager of King County Transit and held this position during the fall of calendar year 2000.
2. She first learned of the reason for the special assessment prior to August 14th, 2000, probably from the Union President, Mr. Norton.
 - a. She didn't know the specific use the Union would put the assessment monies to, or how the Union intended to oppose I-745.
 - b. She knew of no formal request from the Union to King County regarding withholding of the special dues assessment.
 - c. King County Transit did not produce or distribute any assessment waiver forms.
 - d. She didn't know why Mr. Toliver opposed the special election or vote.
 - e. She was not aware of the need for an individual withholding authorization from each Union member.

4.5 Mildred Llarenas was interviewed under oath on April 26, 2001. **(Exhibit 9)** In the interview, Ms. Llarenas stated the following:

1. She is the Payroll Supervisor for King County and she held that position during the fall of calendar year 2000.
2. King County did withhold the special assessment monies from ATU 587 members between September and November, 2000. She knew that these monies would be used to oppose I-745 from a letter received in late August or early September.

King County, King County Department of Transportation, King County Transit, and
Amalgamated Transit Union Local 587
Report of Investigation
PDC Case No. 01-203 & 01-204

- a. She did not know if Mr. Toliver opposed the special assessment election.
 - b. King County did not notify Union members of the reason for withholding of the special assessment.
 - c. Neither she nor King County had "individual signatures from employees as authorization for this deduction..."
 - d. King County did not produce any withholding or waiver of assessment forms.
 - e. Approximately \$155,000 was collected for this assessment by King County, scheduled as a \$10 deduction per pay period over 5 periods. The dates of withholding were September 28, 2000 through November 23, 2000. Approximately 240 members waived the assessment. The assessment monies were remitted to ATU 587 by King County. Ms. Llarenas was asked to furnish specific numbers and amounts by letter.
 - f. When hired, each Union employee completes an authorization for payroll deduction to cover Union dues. (**See Exhibit 7, page 2**) These remain in force, and are not signed again unless the employee is re-hired.
- The number of union members signing a general dues authorization form at the time of hire for employment with King County was as follows:
 - Prior to September 1999: 3,445 members
 - Between September 1999 and September 2000: 388 members

4.6 The supplementary response to a PDC request for fund transfer information was submitted by Mr. Ruffatto. (**Exhibit 10**) The following information was provided:

- Approximately 3,000 King County Transit employees had the special dues assessment withheld.
- The following is a list of dates and amounts of funds withheld by King County Payroll that were transferred to ATU Local 587:

King County, King County Department of Transportation, King County Transit, and
Amalgamated Transit Union Local 587
Report of Investigation
PDC Case No. 01-203 & 01-204

<u>Date Withheld</u>	<u>Amount</u>
09-28-00	\$ 32,151.29
10-12-00	31,411.18
10-26-00	30,796.02
11-09-00	30,723.85
<u>11-22-00</u>	<u>30,714.90</u>
Total amount withheld:	\$ 155,797.24

4.7 Lance Norton was interviewed under oath on April 27, 2001. **(Exhibit 11)** Mr. Norton stated the following:

- a. He is the President/Business Representative of ATU Local 587. He was President from August through December, 2000.
- b. He set up the vote on the special assessment, and coordinated the Union membership vote. He also arranged the opt-out option, allowing members to not contribute to the assessment. The Union executive board participated in decisions regarding the special assessment and election.
- c. When the assessment was being planned, the membership was informed of the reason for it - to oppose I-745. ATU Local 587 had no specific plan as to how it would oppose I-745 during this time period.
- d. The specific methods that the Union would use to oppose I-745 were formulated after the assessment vote - "probably sometime in September." Strategy was determined by a committee of union activists who worked with the Amalgamated Transit Union Legislative Council and those in opposition to I-745, the No on I-745 committees and the group Thousand Friends. The union did not advise King County Transit about how it would oppose I-745. Mr. Norton said he did not know when King County learned the purpose of the assessment.

King County, King County Department of Transportation, King County Transit, and
Amalgamated Transit Union Local 587
Report of Investigation
PDC Case No. 01-203 & 01-204

- e. ATU Local 587 produces a general dues and assessment card that members sign when they are hired (**Exhibit 7 page 2**). This authorization covers regular dues and assessments paid by the membership. When new employees receive their orientation from King County, the union representative has them sign the card. It is then returned to King County.
- f. Approximately \$150,000 was remitted to ATU Local 587 by King County as a result of the assessment. These payments were disbursed over five pay periods, being received by the Union as separate payments. These monies were placed into the Union's general account. \$120,000 of the general account had been withdrawn to set up a separate account. Mr. Norton said as assessment monies came in, they were used to replace general funds used previously to oppose Initiative 745.
- g. Mr. Norton said all of the monies collected from the special assessment were spent. He said \$13,000 was spent on the legislative conference, and the balance was sent to the No on I-745 campaign. He said the special assessment account has no funds remaining in it.
- h. He thought that Mr. Toliver had opposed the assessment election because he didn't want a vote conducted on a political issue on public property.
- i. The Union holds special assessment votes on differing issues. These votes are not infrequent, and members are always informed of the reason for the requested assessment prior to the vote. The average special assessment is about \$50 to \$80 per year.
- j. He was not aware of the requirement to have an annual authorization for deductions being used to oppose a ballot proposition.
- k. Mr. Norton summarized by saying, "the monies came out of the general account early-on and the assessment that followed was reimbursed into the general account..." Special assessment monies were used to replace money already used to oppose I-745.

- 4.8 A review of reports filed with the PDC during the 2000 Election Cycle indicated the following contributions were made by ATU Local 587 to political committees opposing Initiative 745: (**Exhibit 12**)

King County, King County Department of Transportation, King County Transit, and
Amalgamated Transit Union Local 587
Report of Investigation
PDC Case No. 01-203 & 01-204

- The Citizens for Real Transportation Choices reported receiving a \$2,500 contribution on October 2, 2000, from ATU Local 587;
- The Citizens for Real Transportation Choices reported receiving a \$75,000 contribution on October 4, 2000, from ATU Local 587;
- The Amalgamated Transit Union Legislative Committee No on I-745 reported receiving a \$13,000 contribution on October 14, 2000, from ATU Local 587; and
- The Citizens for Real Transportation Choices reported receiving a \$4,800 contribution on October 31, 2000, from ATU Local 587.

4.9 Paul Toliver was interviewed under oath on May 2, 2001. **(Exhibit 13)** Mr. Toliver stated the following during his interview:

- a. He is the Director of the King County Department of Transportation and has held that position since 1996.
- b. He learned of the special assessment election from an August 14th letter from Mr. Freed, attorney for ATU Local 587.
- c. His opposition to the Union assessment election resulted from his concern that the assessment in question would oppose a ballot proposition. He wasn't sure that this activity was permitted on County property. He knew of no official written communication from King County to the Union on this issue. He said all communications were oral.
- d. He did not know how the Union specifically intended to oppose I-745.
- e. He was not familiar with the Waiver of Assessment form, and did not know if King County had produced or distributed any withholding authorizations.

4.10 **Use of the special assessment**

1. Staff reviewed the awareness of King County regarding use of the special assessment monies. We found that:

King County, King County Department of Transportation, King County Transit, and
Amalgamated Transit Union Local 587
Report of Investigation
PDC Case No. 01-203 & 01-204

- a. An August 14, 2000 letter from Mr. Freed to Paul Toliver notified him that the purpose of the special assessment election was to oppose I-745.
- b. The special assessment election was held on August 24, 2000. On August 25, 2000, ATU Local 587 notified the King County Payroll Supervisor - Ms. Llarenas - that the membership had elected to assess each member \$50 in special dues to "fight I-745." The withholding dates were between September 14 and November 23. **(See Exhibit 3, page 8)**
- c. An October 24, 2000 letter to Ms. Llarenas from ATU Local 587 Financial Secretary, Mr. Griffin, discussed the mechanics of the withholding. The letter is headed: RE: I-745 Assessment. **(See Exhibit 3, page 10)**
- d. An early Waiver of I-745 Assessment form was signed by the member and Union Financial Secretary on August 24, 2000, and then forwarded to King County Payroll. **(See Exhibit 3, page 14)**
- e. Ms. Llarenas said that she learned that these monies would be used to oppose I-745 in a letter received in late August or early September, 2000. She said she didn't know anything about the methods that would be used to oppose the Initiative. **(See Exhibit 9)**
- f. In his interview, Paul Toliver stated that he knew that the purpose of the special assessment was to oppose I-745. He said that he did not know how the Union intended to oppose it.
 1. His objection to the Union special assessment vote was based on his concern for using County property for activity on the Union vote to oppose a ballot proposition.
 2. Communications between the Union and King County staff regarding these reservations about the vote were oral.
- g. In her interview, Mary Peterson, Assistant Director of King County Transit, said that she was not specifically aware of an annual requirement for authorization to deduct wages for contributions to a political committee or candidates for state or local office.

King County, King County Department of Transportation, King County Transit, and
Amalgamated Transit Union Local 587
Report of Investigation
PDC Case No. 01-203 & 01-204

2. Staff reviewed ATU Local 587's use of special assessment monies. We found that:
 - a. ATU President Lance Norton stated that the Union had not decided how it would oppose I-745 until September, 2000.
 - b. Research of PDC records showed the following contributions made by ATU Local 587: **(See Exhibit 12)**

<u>Date</u>	<u>Recipient</u>	<u>Amount</u>
10-2-00	Citizens for Real Transportation Choices	\$ 2,500
10-4-00	Citizens for Real Transportation Choices	75,000
10-14-00	ATU Leg Council No on I-745	13,000
<u>10-31-00</u>	<u>Citizens for Real Transportation Choices</u>	<u>4,800</u>
TOTAL		\$ 95,300

3. Staff reviewed whether King County had signed authorization requests from its employees stating that a special assessment could be withheld from their paychecks to be used as political contributions. We found that:
 - a. The standard form signed by Union members at hiring is the Authorization for Wage Deduction to Cover Union Dues for initiation fees, monthly dues and assessments levied. This form does not conform to the requirements of WAC 390-17-100 for a withholding form.

For example, the form is signed only when the member is hired or rehired, and is not re-signed annually, the form does not specify the name, city and state of the political committee for which contributions are withheld. In addition, the authorization form does not include the statement required in WAC 390-17-100(2)(g) informing the employee that no employer or labor organization may discriminate for failure to contribute, support or oppose a candidate, ballot proposition, political party or political committee.
 - b. Ms. Llarenas stated that King County did not have individual signatures from employees to authorize this special assessment deduction. **(See Exhibit 9)**
 1. She stated that in her view the authorization for withholding of the special assessment deduction was a letter from Paul Griffin, Financial Secretary for ATU Local

King County, King County Department of Transportation, King County Transit, and
Amalgamated Transit Union Local 587
Report of Investigation
PDC Case No. 01-203 & 01-204

587, to her at King County Payroll, dated August 25, 2000. This letter informed her of the Union vote to assess \$50 per member (\$10 per payday) beginning with the September 14th payroll. **(See Exhibit 3, page 8)**

2. Ms. Llarenas said she did not know of the requirement under PDC law to obtain annual written authorizations from employees when special assessments were going to be deducted for use as political contributions.
4. Staff reviewed whether payroll deductions were made. We found that:
 - a. Ms. Llarenas stated that approximately \$155,000 was collected for this assessment by King County, and remitted to ATU Local 587. The time frame for this transfer was September through November, 2000. **(See Exhibit 9)**. The exact amount transferred (\$155,797.24), and dates of transfer (September 28, 2000-November 22, 2000) were furnished in a separate letter. **(See Exhibit 10)**
 - b. ATU Local 587 accounting of the monies involved showed in excess of \$155,000 transferred from King County payroll to ATU Local 587 from September through November, 2000. **(Exhibit 14)**
- 4.11 In all matters relating to this investigation, King County, King County Department of Transportation, King County Transit, and ATU Local 587 have fully cooperated with PDC staff.

Respectfully Submitted this 11th day of May, 2001.

Nick Hawkinson
Investigator

LIST OF EXHIBITS

1. Complaint letter from Monte Benham with Permanent Offense.
2. Interview of Monte Benham, complainant.
3. Response from the Office of the King County Prosecutor.
4. Amalgamated Transit Union Local 587 response.
5. Correspondence between King County and ATU.
6. August 2000 ATU Local 587 Newsletter.
7. Authorization for Wage Deduction to cover Union Dues.
8. Interview of Mary Peterson.
9. Interview of Mildred Llarenas.
10. Supplementary payroll data from King County.
11. Interview of Lance Norton.
12. C-3 reports filed with the PDC by Citizens for Real Transportation Choices and ATU Legislative Council Committee No on I-745.
13. Interview of Paul Toliver.
14. Supplementary Accounting from ATU 587.